

## **REMARKS**

In the March 3, 2005 Office Action, the Examiner objected to informalities in the specification, requesting an updated description for pending applications referenced in the specification. The Examiner also rejected claims 1-3, 15-17, and 29-31 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Publication No. 20020007393 to Hamel (hereinafter “Hamel”). However, the Examiner also indicated that claims 4-14, 18-28, and 32-42 are allowed. Applicants note with appreciation the indication that originally filed claims 4-14, 18-28, and 32-42 are allowed. With respect to these claims, Applicants reserve the right to take the allowed claims, but must now respectfully traverse the rejections of claims 1-3, 15-17, and 29-31 because, as explained more fully below, the cited Hamel reference fails to disclose caching content using a cache identifier that is based on a URI and cookie value associated with the content as claimed.

### **A. Amendment to Specification**

Applicants have corrected the description of the related applications to include updated information, and request that the objection to the specification be withdrawn.

### **B. Claim 4 Has Been Amended To Conform To The “Allowable Subject Matter” Identified By The Examiner**

Applicants have amended claim 4 so that the claim now conforms to the allowable subject matter identified by the Examiner. With this amendment, Applicants have removed the recitation of “retrieving the fragment from the cache using the cache identifier” and “generating a second response message comprising the fragment; and sending the second response message to the second client device.” Applicants have also amended claim 6 to incorporate the recitations removed from claim 4.

### **C. Claims 1-3, 15-17, and 29-31 Are Not Anticipated by Hamel**

In response to the Examiner’s rejection of claims 1-3, 15-17, and 29-31 as being anticipated by Hamel, Applicants respectfully request reconsideration and withdrawal of the rejection because Hamel’s disclosure of an ad proxy for caching cookies does not anticipate the present invention’s scheme for caching content objects (such as a role-specific fragment) by using a cache ID that is based on a URI and a cookie value associated with the content object. *See, e.g.*, Application, paragraphs 36, 302 and 310. This scheme is variously recited in the

claims with reference to caching a content object “using a cache identifier for the content object that is based on a URI (Uniform Resource Identifier) for the content object and a cookie value associated with the content object” where the “cookie value is associated with a user role,” and the “content object is a role-specific fragment.” *See, e.g.*, claims 1-3.

Applicants respectfully submit that the claim rejections completely ignore the specific language of the claims that recite caching a content object using a cache ID that is based on a URI and cookie value associated with the content object. For example, the rejection of claim 1 states that this feature is found in Hamel at Figure 3 (350) and Figure 6A (#605). *See, Office Action*, p. 2 (March 3, 2005). However, a careful reading of the cited description from Hamel confirms that Hamel is not disclosing the present invention’s use of the recited cache ID to store a content object in a cache. While Hamel does disclose that ad content from an ad server may be cached at the host as a background task (Hamel, paragraph 87), there is absolutely no disclosure, suggestion or hint that the caching operation uses the claimed cache ID. Indeed, Hamel’s description of the referenced step 605 in Figure 6A refers only to a host receiving a cookie 536 along with the ad 535 from the ad server 560, where both are “cached” in a hidden frame 537. *See*, Hamel, paragraph 96. However, Hamel entirely fails to teach using the claimed cache ID when caching the ad content.

In addition to the cache ID deficiency, Hamel fails to disclose receiving a request that contains both the URI and an associated cookie having the cookie value associated with the content object. The Examiner asserts that this feature is found in Hamel in the description of steps 615 and 620 shown in Figure 6A, but this is not the case. Step 615 is described by Hamel as the step where the “cookie 536’ for Ad Server 560 is cached by browser 510 at the same time that ad 535 is presented within applet 532.” Hamel, paragraph 96. Thus, there is no reference to receiving a request that contains the URI and an associated cookie having the recited cookie value. As for step 620, Hamel describes this as the step “when a click-through is requested by the user for Ad 635 within applet 532’.” Hamel, paragraph 98. In the absence of any disclosure by Hamel that the received click-through request contains “the URI and an associated cookie having the cookie value,” this additional difference further confirms that Hamel does not anticipate the present invention.

In addition to the fact that Hamel’s request does not include the URI and associated cookie, Hamel also fails to disclose or suggest retrieving the content object from the cache

“using the URI and cookie value.” On this point, Hamel’s description, including the description of step 625 relied upon by the Examiner, is entirely silent. In particular, Hamel does describe step 625 in terms of retrieving a cookie 536’ from the hidden frame, where the browser 510 associated the cookie 536 with a click-through request. However, there is no teaching in Hamel of using the URI and cookie value to retrieve the content object from cache, as recited in the claims.

In addition to the foregoing deficiencies in the independent claims 1, 15 and 29, the requirements of the dependent claims are likewise not met by the Hamel disclosure. For example, the Examiner asserts that the dependent claims 2-3, 16-17 and 30-31 are anticipated since “Hamel discloses the cookie value is associated with a user role and the content object is a role-specific fragment (See paragraph 0093).” See, Office Action, p. 3. While the referenced passage refers to a cookie as “describing the user's prior profile created by Ad Server 160,” this is nothing more than the conventional description of a cookie, and in no way refers to a particular cookie value being associated with a “user role” so that the content object can act as a “role-specific fragment.” In contrast to Hamel, Applicants have disclosed and claimed using a cookie that contains the user’s role in requests for role-specific fragments and in the cache identifier for role-specific fragments, thereby allowing requests from other users for role-specific fragments to be resolved in the cache when the users have the same role because these users would also have the same cookie:

Using the present invention, role-specific content can be cached, e.g., managerial versus non-managerial, and the user's role within an organization can be used to assist in the determination of which set of cached content is returned to the user.

Application, paragraph 306.

At best, Hamel discloses caching ad content and cookies, but in no way teaches or suggests using a URI and an associated cookie value to form a cache ID that is used to cache the content object. Nor does Hamel disclose receiving a request that contains both the URI and associated cookie value. Nor does Hamel disclose retrieving the cached content object using the URI and associated cookie value. Nor does Hamel meet the requirement of the dependent claims. Accordingly, Hamel cannot be used as an anticipatory reference against the claims. Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987) (“A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.”). Accordingly,

Applicants respectfully request that the anticipation rejection of claims 1-3, 15-17, and 29-31 be withdrawn and that the claims be allowed.

### **CONCLUSION**

In view of the amendments and remarks set forth herein, Applicant respectfully submits that all pending claims are in condition for allowance and requests that a Notice of Allowance be issued. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is requested to telephone the undersigned at 512-338-9100.

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Respectfully submitted,

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